

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND (GREENBELT)**

---

CANDACE E. ALSTON,  
Plaintiff,

CASE NO.

vs.

TRANSUNION LLC; and EXPERIAN  
INFORMATION SOLUTIONS INC.,  
Defendants.

---

**TRANS UNION, LLC'S NOTICE OF REMOVAL**

---

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC ("Trans Union") hereby removes the subject action from the Circuit Court for Prince George's County, Maryland, to the United States District Court for the District of Maryland, on the following grounds:

1. Plaintiff Candace E. Alston served Trans Union on or about March 27, 2014, with a Summons and Complaint filed in the Circuit Court for Prince George's County, Maryland. Copies of the Summons and Complaint are attached hereto as **Exhibit A** and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the "FCRA"). See Complaint ¶¶ 39-49.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

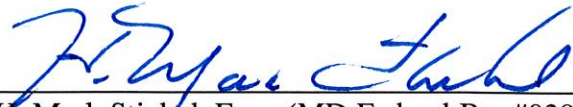
4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Circuit Court for Prince George's County, Maryland, to the United States District Court for the Eastern District of Michigan.

5. As of the date of this Notice Of Removal, Defendant Experian Information Solutions, Inc. ("Experian") has been served. Counsel for Trans Union has contacted counsel for Experian and they have consented to this removal as evidenced by the consent attached hereto as Exhibit C.

6. Notice of this removal will promptly be filed with the Circuit Court for Prince George's County, Maryland and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the Circuit Court for Prince George's County, Maryland to this United States District Court, District of Maryland.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "H. Mark Stichel", is written over a horizontal line.

H. Mark Stichel, Esq. (MD Federal Bar #02939)  
Gohn Hankey and Stichel, LLP  
201 North Charles Street, Suite 2101  
Baltimore, MD 21201  
Telephone: (410) 752-9300  
Fax: (410) 752-2519  
E-Mail: [hmstichel@ghsllp.com](mailto:hmstichel@ghsllp.com)

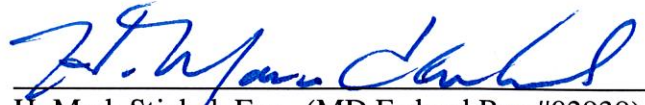
*Counsel for Defendant Trans Union, LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **10th day of April, 2014**, properly addressed as follows:

**Pro Se Plaintiff**

Candace E. Alston  
10012 Cedar Hollow Lane  
Largo, MD 20774



H. Mark Stichel, Esq. (MD Federal Bar #02939)  
Gohn Hankey and Stichel, LLP  
201 North Charles Street, Suite 2101  
Baltimore, MD 21201  
Telephone: (410) 752-9300  
Fax: (410) 752-2519  
E-Mail: [hmstichel@ghsllp.com](mailto:hmstichel@ghsllp.com)

*Counsel for Defendant Trans Union, LLC*